CBS Corporation

Environmental Remediation
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Pittsburgh, PA 15222

Via Electronic Mail and Federal Express
January 16, 2015

Ms. Carmen D. Santos
PCB Coordinator
U.S. Environmental Protection Agency, Region 9
Waste Management Division
RCRA Corrective Action Office (WST-5)
75 Hawthorne Street
San Francisco, CA 94105

Re: Supplemental Information, Building Cleaning and Sampling Work Plan Former Westinghouse Electric Corporation (Westinghouse) Apparatus Repair Plant, Rancho Dominguez, California

Dear Ms. Santos:

CBS Corporation (CBS) has received the U.S. Environmental Protection Agency (EPA), Region 9 conditional approval of the *Building Cleaning and Sampling Work Plan, Former Westinghouse Apparatus Repair Plant, Rancho Dominguez, California* (February 20, 2014, and subsequently amended by CBS). EPA's conditional approval letter, which was dated December 5, 2014, requested additional information to be submitted within 7 or 14 days of the date of the letter. In the December 9, 2014 teleconference with EPA and CBS representatives, EPA granted an extension until January 16, 2015 for submittal of this supplemental information. CBS also provided a preliminary response to these requested items via electronic mail on December 12, 2014.

Below are the EPA's information requests (in *italicized* type) followed by CBS's response.

Part E, Section 1 – Pre-characterization Building cleaning, "temporary decontamination areas," and time frame to complete Building cleaning. *Within seven (7) days after the date of* this *Approval, the Parties must submit to EPA a description of measures it will take to prevent potential tenant exposure to PCBs during pre-cleaning sampling, pre-characterization Building cleaning activities, and characterization sampling. Such measures must describe the Parties approach to prevent mobilization of PCBs onto areas occupied and/or in use by tenants. In addition, the Parties must submit figures that clearly depict the location of physical barriers and pre-characterization Building cleaning containment areas relative to in-use and occupied tenant areas.*

As discussed with EPA in the December 9, 2014 teleconference, there are three fundamental components to CBS' work plan designed to minimize potential tenant exposure to polychlorinated biphenyls (PCBs) during pre-cleaning sampling, pre-characterization building cleaning activities, and characterization sampling:

1. Conducting the work during off-shift hours;
2. Using cleaning procedures that do not produce dusts or vapors; and
3. Physically cordoning off work areas.

Cleaning and sampling activities will be conducted during off-shift hours when tenant personnel are not in the building.[1] This approach will substantially reduce the potential for tenant exposure.

The procedures being used in the initial phase of pre-characterization cleaning are specifically designed to minimize dust generation. Non-porous surfaces will first be cleaned using high-efficiency particulate air (HEPA) vacuums to remove dust accumulations followed by wet wiping using rags moistened with surfactant. Porous surfaces will be cleaned by pre-wetting the surface with surfactant, scrubbing, absorbing the residuals, and collecting the residuals with a HEPA vacuum. These procedures do not allow for mobilization of PCB-containing materials onto areas used by the tenants.

Active work zones will be defined using barricades and caution tape, and warning signs will be posted around the perimeter of the active work areas to control access. The enclosed Figure 1 has been revised to show the anticipated individual work zones, each representing an area of approximately 10,000 square feet. As requested by EPA, Figure 1 also shows portions of the building as occupied and unoccupied.[2]

To prepare for work in each zone, the inventory stored in that area will first be relocated within the Warehouse. The work zone in which cleaning activities are to be conducted will then be cordoned-off and clearly marked to caution tenant personnel against entering the work zone. After cleaning and sampling activities are completed within a work zone, the work will move to the next zone using similar steps of inventory relocation, barricading, and cleaning and sampling. Work is planned to begin in the northeast portion of the building (encompassing the loading dock and former detank pit) and proceed in the sequence shown in Figure 1. The sequencing and the sizes of the active work zones may be adjusted based on the tenant's operations at the time of cleaning.

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[1] The only exception is air sampling. The period of collection for air samples will extend into normal business hours when tenant personnel are present.

[2] The Main Office area on the western side of the building and the Warehouse area are both occupied by tenant personnel during normal business hours. The Break Room is used for about an hour per day by site workers. Tenant personnel at times go in and out of the Interior Storage Room and other storage rooms, but there are no full-time or part-time workers stationed in these rooms. The office space located within the Warehouse area is currently unoccupied.

By working during off-shift hours, floor-to-ceiling containment barriers will not be necessary. CBS believes that the installation of such barriers poses a greater risk of mobilizing the dusts on the perch surfaces of the building.

Part E, Section 2 – Application, Sections 2.1.1 (Non-Porous Surfaces) and 2.1.2 (Porous Surfaces). *EPA interprets Sections 2.1.1 and 2.1.2 to be a pilot study. Within seven (7) days of the date of this Approval, the Parties must confirm if Sections 2.1.1 and 2.1.2 are intended to be a pilot study. If this is the case, the PCB analytical results for materials sampled after cleaning with Simple Green must be compared to the PCB risk-based screening levels (PCB RSL) in Section 3.0 (Sampling and Analysis Plan) of the Application, or to risk-based levels developed through a site-specific risk assessment. The time frame to conduct and complete the pilot study must be proposed by the Parties for EPA approval. Such pilot study must not delay cleanup of the Building for continued use as the Parties must comply with the use authorization in 40 CFR 761.30(u)(1).*

Simple Green® is a low-toxicity all-purpose detergent that should be effective in removing oily dirt from various surfaces, including the concrete floor, in advance of characterization sampling. As described in our email correspondence on December 12, 2014, CBS is not proposing the use of Simple Green® as a pilot study for PCB decontamination of porous or non-porous surfaces.

Wipe samples of non-porous surface and bulk samples of porous surfaces will be collected as the cleaning work progresses in each cleaning zone. The results of these initial samples will be evaluated to assess the efficacy of the cleaning process. CBS will direct modifications to the cleaning approach (*e.g.*, more aggressive scrubbing of non-porous surfaces) if post-cleaning sample results show residual concentrations of PCBs.

Part E, Section 4 – Application, Section 3.0, Sampling and Analysis plan (SAP). *Within seven (7) days after the date of the Approval, CBS must submit revised figures depicting the areas proposed for pre-characterization cleaning relative to the areas currently occupied and/or in use by the tenants.*

The enclosed Figure 1 has been revised to show the locations of occupied and unoccupied areas of the building and the sequencing of the cleaning activities.

Part E, Section 4, Item c – Samples of "sediment" accumulated in drains inside the Building. *Within seven (7) days after the date of this Approval submit figures depicting the location of the drains inside the Building that will be sampled. Prior to Building cleaning, discrete bulk "sediment" samples must be collected from each drain before removing the "sediments" for offsite disposal. These samples must be individually analyzed.*

CBS does not currently have a plant map showing drain locations. During the site inspection on January 9, 2015, CBS observed what appeared to be a floor drain at one location, but at the time of the inspection, stored inventory in the Warehouse covered a large

percentage of the floor. Because it is not practical to try to locate all floor drains in advance, CBS proposes the following approach to address floor drains:

- Once inventory is cleared from each work zone, the floor of that zone will be examined and any floor drains identified and located on a site base map;
- Any identified floor drain will be inspected to determine whether it is still functional or if it had previously been plugged; and
- If sediments are present, a bulk sample of the sediments will be collected for PCB analysis before cleaning begins in the work zone.

After sampling, floor drains will be cleaned by manually removing sediment and wiping. The report on the pre-characterization sampling will show all identified floor drain locations on a plant site map with accompanying descriptions of whether or not the drain was sealed and the results of sampling and analysis of any sediment found in (and removed from) these drains.

Part E, Section 4, Item e – Air sampling (Indoor and Background Outdoor). *Within seven (7) days after the date of this Approval, the Parties must propose additional air samples to be collected before and after they conduct pre-characterization cleaning. That proposal must include revised figures and tables depicting the actual location and number of the additional air samples relative to those already included in the Application as amended by CBS. A reference outdoor air background sample must be collected concurrently with all indoor air samples.*

The enclosed Figure 2 has been revised to show a total of seven air sampling locations, six locations inside occupied areas of the building and one location outside the building. The actual locations may be adjusted based on the tenant's operations at the time of sampling. All seven locations will be sampled during both the pre-cleaning and post-cleaning phases of the project. Interim sampling (*e.g.*, during cleaning) will be conducted as initially proposed, *i.e.*, two events, each with two samples in the Warehouse and one in the Offices.[3]

Pre-cleaning and post-cleaning dust (bulk and wipes) and air samples must be collected in all areas currently being used as office space and special use rooms (e.g., break rooms). The revised figures must clearly show the layout of the Building and areas being used and/or occupied by the tenants.

The occupied and unoccupied areas are labeled on the figures. Pre-cleaning air samples and post-cleaning bulk, wipe, and air samples will be collected from the Office area on the western side of the building and in the Break Room in the warehouse area. No bulk samples are proposed for the Office area on the western side of the facility.

[3] For air samples collected during cleaning activities, one Warehouse sample location will be inside the active work zone and one will be outside the active work zone.

Within seven (7) days after the date of this Approval, the Parties must provide in writing to EPA a written description of the measures they will implement to prevent overloading of the PUF and quartz filter. The Parties must consult with their contract analytical laboratory on this matter since collection of 48-hour indoor air samples is proposed in the Application.

CBS does not expect the ambient indoor air conditions to be excessively dusty during air sampling. Nonetheless, CBS's consultant has contacted the laboratory and the air sampling equipment supplier to determine the appropriate measures to prevent the overloading of the PUF filters. The laboratory indicated that the PUF filter is unlikely to become overloaded unless the source concentrations in ambient air are very high (*e.g.*, dusty environment), in which case the sample collection time and air volume become less critical as the PCB concentration in air would be well above the Risk Screening Levels. The air sampling equipment vendor confirmed that the low-volume pumps will self-regulate to maintain the desired flow rate as the filters become loaded. If the filters become so overloaded that the pump cannot maintain the flow rate, the pump will shut off and automatically stop the timer.

It should be noted that CBS selected the TO-10A method (low-volume) to minimize disruption to ongoing facility operations *(e.g.*, noise in the office area and space limitations in the high traffic areas of the warehouse). If site conditions warrant, CBS may consider using the TO-4A method for subsequent air samples.

Part E, Section 5 – Forced air heating, ventilation, and air conditioning (HVAC) system. *Within 14 days after the date of this Approval the Parties must provide EPA with a description of the procedures to clean up or decontaminate the HVAC systems.*

During the January 9, 2015 site inspection, CBS confirmed that the Warehouse has no central heating, ventilation, and air conditioning (HVAC) system. The Office area on the western side of the building and the (unoccupied) offices in the Warehouse have individual HVAC systems, but both are independent of the Warehouse.

A thorough inspection will be conducted in each area served by a central HVAC system, and inflow and return grates will be identified and located on a site base map. Grates will be removed and dust samples collected from on the grate and inside the ductwork if dust is present. If no dust is present, a wipe sample will be collected from the ductwork just inside the grate. Immediately following sampling, any dust accumulation will being removed from accessible ductwork using a HEPA vacuum. After vacuuming, the accessible ductwork will be cleaned by wet wiping using rags moistened with surfactant.

The report on the pre-characterization sample will provide the locations of all HVAC system samples. The need for and scope of further cleaning of the HVAC system will depend on the results of the pre-cleaning sampling.

Part E, Section 7 – Additional Information. *Within 30 days after the date of the approval, CBS must submit the information requested in this condition to EPA.*

As required in 40 CFR 761.61(c), the Parties must submit a summary of all available site characterization data available for the PCB Cleanup Site. Readable electronic copies of laboratory analytical reports associated with PCB characterization and any PCB cleanup conducted at the Facility and the Building before the date of this Approval must be submitted in electronic format (e.g., CD-ROM). Figures of the Facility and Building depicting all sampling locations and sample analysis results to date must also be submitted.

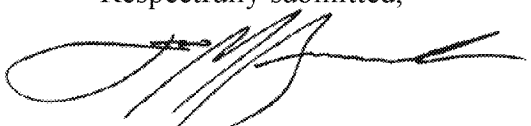
In March 2014, CBS provided EPA with a login ID and password to a FTP site containing all of the available historical reports, tables, figures, and analytical data reports for the site. On December 15, 2014, CBS's consultant sent D-size prints of the historical PCB sample locations and a corresponding table with the sampling dates and results.

Part E, Section 9 – Waste management and disposal. *Within seven (7) days after the date of this Approval, explain the measures the Parties will implement to prevent leakage of liquids contaminated with PCBs that may separate from the spent absorbent placed in plastic bags.*

Liquid cleaning materials (*e.g.*, floor scrubbing residuals) will be thoroughly mixed with sorbent material such that no free liquids are present and no liquids can be squeezed out of the sorbent material using moderate hand pressure. Before loading the bags, additional sorbent will be placed inside the bags. Roll-off box tailgates will be inspected to assure that there are no holes or other damage to the bed and the rubber seals are in good condition and are properly seated when the tailgate is closed. A form-fitting plastic liner will be placed inside the roll-off box as secondary protection. The roll-off boxes will be covered to prevent precipitation exposure and will be labeled and cordoned off to control access by facility personnel.

We trust that this submittal is responsive to your information request. CBS is working with its consultant and contractor, as well as the site owner and tenant, to finalize arrangements for the sampling and the cleaning work. We will notify you in advance of mobilizing for these activities. In the meantime, if you have any questions, please do not hesitate to contact me.

Respectfully submitted,



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